

ATTACHMENT “B”

RICO STATEMENTS ALLEGATIONS GRID

Chechen Operations	
<i>O'Neill</i>	<i>Euro Brokers</i> Al Baraka operated banks in Chechnya during the mid-to-late 1990s when al Qaeda affiliated leaders were in command of the Chechen military and portions of the government. Saleh Kamel/DABG also consulted the Chechen government on establishing a Shariah-compliant economy, sponsoring Chechen specialists to go to the U.S. to study Shariah-complaint Islamic finance. In reality Saleh Kamel/DABG was just expanding their global jihadist banking network. Kamel set-up operations in a locality where al Qaeda was known to operate, then directed millions of dollars in illicit funding from the Middle East for the jihan against Russian and foreign civilian targets including Americans.
<i>Cantor Fitzgerald</i>	<i>Continental Casualty</i> Al Baraka operated banks in Chechnya during the mid-to-late 1990s when al Qaeda affiliated leaders were in command of the Chechen military and portions of the government. Saleh Kamel/DABG also consulted the Chechen government on establishing a Shariah-compliant economy, sponsoring Chechen specialists to go to the U.S. to study Shariah-complaint Islamic finance. In reality Saleh Kamel/DABG was just expanding their global jihadist banking network. Kamel set-up operations in a locality where al Qaeda was known to operate, then directed millions of dollars in illicit funding from the Middle East for the jihan against Russian and foreign civilian targets including Americans
<i>NY MAGIC</i>	<i>WTC Properties</i> Al Baraka operated banks in Chechnya during the mid-to-late 1990s when al Qaeda affiliated leaders were in command of the Chechen military and portions of the government. Saleh Kamel/DABG also consulted the Chechen government on establishing a Shariah-compliant economy, sponsoring Chechen specialists to go to the U.S. to study Shariah-complaint Islamic finance. In reality Saleh Kamel/DABG was just expanding their global jihadist banking network. Kamel set-up operations in a locality where al Qaeda was known to operate, then directed millions of dollars in illicit funding from the Middle East for the jihan against Russian and foreign civilian targets including Americans.

Additional Provision of Banking Services	
<i>O'Neill</i>	<i>Euro Brokers</i> Kamel/DABG also provided material support to the Spanish Al Qaeda cell which directly funded and helped coordinate the September 11 th hijacker cell. Muhammed Galeb Kalajae Zouaydi, financial head of the cell, used Al Baraka Bank Finance House in Turkey to transfer money to Mahomed Bahiah, aka Abu Khaled, courier of Usama bin Laden in Europe, and brother-in-law of Zouaydi.
<i>Cantor Fitzgerald</i>	<i>Continental Casualty</i> Kamel/DABG also provided material support to the Spanish Al Qaeda cell which directly funded and helped coordinate the September 11 th hijacker cell. Muhammed Galeb Kalajae Zouaydi, financial head of the cell, used Al Baraka Bank Finance House in Turkey to transfer money to Mahomed Bahiah, aka Abu Khaled, courier of Usama bin Laden in Europe, and brother-in-law of Zouaydi.
<i>NY MAGIC</i>	<i>WTC Properties</i> Kamel/DABG also provided material support to the Spanish Al Qaeda cell which directly funded and helped coordinate the September 11 th hijacker cell. Muhammed Galeb Kalajae Zouaydi, financial head of the cell, used Al Baraka Bank Finance House in Turkey to transfer money to Mahomed Bahiah, aka Abu Khaled, courier of Usama bin Laden in Europe, and brother-in-law of Zouaydi.

Albanian Banking Activities

<i>O'Neill</i>	<i>Euro Brokers</i>
<p>- ABID is also a shareholder of several other banks, including Arab Albanian Bank...</p> <p>- The Arab Albanian Islamic Bank was used by Osama Bin Laden operations...</p> <p>- Along with SDGT Yassin Al Qadi, Kamel is a founder, financier and shareholder of Albanian International Development, Ltd. ("ALINTID") which was established during the early 1990s.</p> <p>-Multiple private and government sources have confirmed that Kamel and Yassin Al Qadi turned over the ownership and financial assets of ALINTID to Osama Bin Laden in support of his international terrorist network when he visited Albania in 1995. OFAC has described Albania as the Ground Zero for terrorist financing. This story has been confirmed by OFAC, a witness by the name of Adnon, and anonymous witness in the U.K.</p>	<p>- ABID is also a shareholder of several other banks, including Arab Albanian Bank...</p> <p>- The Arab Albanian Islamic Bank was used by Osama Bin Laden operations...</p> <p>- Along with SDGT Yassin Al Qadi, Kamel is a founder, financier and shareholder of Albanian International Development, Ltd. ("ALINTID") which was established during the early 1990s.</p> <p>-Multiple private and government sources have confirmed that Kamel and Yassin Al Qadi turned over the ownership and financial assets of ALINTID to Osama Bin Laden in support of his international terrorist network when he visited Albania in 1995. OFAC has described Albania as the Ground Zero for terrorist financing. This story has been confirmed by OFAC, a witness by the name of Adnon, and anonymous witness in the U.K.</p>
<i>Cantor Fitzgerald</i>	<i>Continental Casualty</i>
<p>Contains only conclusory allegations.</p>	<p>- ABID is also a shareholder of several other banks, including Arab Albanian Bank...</p> <p>- The Arab Albanian Islamic Bank was used by Osama Bin Laden operations...</p> <p>- Along with SDGT Yassin Al Qadi, Kamel is a founder, financier and shareholder of Albanian International Development, Ltd. ("ALINTID") which was established during the early 1990s.</p> <p>-Multiple private and government sources have confirmed that Kamel and Yassin Al Qadi turned over the ownership and financial assets of ALINTID to Osama Bin Laden in support of his international terrorist network when he visited Albania in 1995. OFAC has described Albania as the Ground Zero for terrorist financing. This story has been confirmed by OFAC, a witness by the name of Adnon, and anonymous witness in the U.K.</p>
<i>NY MAGIC</i>	<i>WTC Properties</i>
<p>Contains only conclusory allegations.</p>	<p>- ABID is also a shareholder of several other banks, including Arab Albanian Bank...</p> <p>- The Arab Albanian Islamic Bank was used by Osama Bin Laden operations...</p> <p>- Along with SDGT Yassin Al Qadi, Kamel is a founder, financier and shareholder of Albanian International Development, Ltd. ("ALINTID") which was established during the early 1990s.</p> <p>-Multiple private and government sources have confirmed that Kamel and Yassin Al Qadi turned over the ownership and financial assets of ALINTID to Osama Bin Laden in support of his international terrorist network when he visited Albania in 1995. OFAC has described Albania as the Ground Zero for terrorist financing. This story has been confirmed by OFAC, a witness by the name of Adnon, and anonymous witness in the U.K.</p>

Misc. Banking Enterprises

<p><i>O'Neill</i></p> <ul style="list-style-type: none"> - In November 1993, the Arab Albanian Islac Bank was.. established [with the following shareholders]: Islamic Development Bank (15%), Saudi Dallah Al Baraka Group (10%). .. Al Baraka Bank had an indirect control of AAIB through its own state in the bank and through its own shareholding interest in the Islamic Development Bank. - In 1977, Saleh Kamel helped found... the Islamic Bank of Luxembourg. -In 1995... Saleh Kamel and Al Baraka Bank had “major investments” in Bank Al-Taqwa, [an SDGT] 	<p><i>Euro Brokers</i></p> <ul style="list-style-type: none"> - In November 1993, the Arab Albanian Islac Bank was.. established [with the following shareholders]: Islamic Development Bank (15%), Saudi Dallah Al Baraka Group (10%). .. Al Baraka Bank had an indirect control of AAIB through its own state in the bank and through its own shareholding interest in the Islamic Development Bank. - In 1977, Saleh Kamel helped found... the Islamic Bank of Luxembourg. -In 1995... Saleh Kamel and Al Baraka Bank had “major investments” in Bank Al-Taqwa, [an SDGT]
<p><i>Cantor Fitzgerald</i></p> <p>Contains only conclusory allegations.</p>	<p><i>Continental Casualty</i></p> <ul style="list-style-type: none"> - In November 1993, the Arab Albanian Islac Bank was.. established [with the following shareholders]: Islamic Development Bank (15%), Saudi Dallah Al Baraka Group (10%). .. Al Baraka Bank had an indirect control of AAIB through its own state in the bank and through its own shareholding interest in the Islamic Development Bank. - In 1977, Saleh Kamel helped found... the Islamic Bank of Luxembourg. -In 1995... Saleh Kamel and Al Baraka Bank had “major investments” in Bank Al-Taqwa, [an SDGT]
<p><i>NY MAGIC</i></p> <p>Contains only conclusory allegations.</p>	<p><i>WTC Properties</i></p> <ul style="list-style-type: none"> - In November 1993, the Arab Albanian Islac Bank was.. established [with the following shareholders]: Islamic Development Bank (15%), Saudi Dallah Al Baraka Group (10%). .. Al Baraka Bank had an indirect control of AAIB through its own state in the bank and through its own shareholding interest in the Islamic Development Bank. - In 1977, Saleh Kamel helped found... the Islamic Bank of Luxembourg. -In 1995... Saleh Kamel and Al Baraka Bank had “major investments” in Bank Al-Taqwa, [an SDGT]

Additional Sudanese Allegations

<i>O'Neill</i>	<i>Euro Brokers</i>
<p>In 1992, regarding Saleh Kamel's and Al Baraka's investments in Sudan, Rashid Oomer, managing director of Al Baraka Finance stated “[c]urrently, 60 percent of the Saudi imports of these seeds are sources by us from Sudan.”</p> <p>A 1996 United States State Department report entitled, <i>Osama Bin Laden: Islamic Extremist Financier</i>, describes the likely economic collaboration of Saleh Kamel and Al Baraka with Bin Laden:</p> <p>“Bin Laden’s import-export firm Wadi al-Aqiq Company, Ltd., in conjunction with his Taha Investment Company, Lrd., secured a near monopoly over Sudan’s major agricultural exports of gum, corn, sunflower, and sesame products in cooperation with prominent NIF members.”</p>	<p>In 1992, regarding Saleh Kamel's and Al Baraka's investments in Sudan, Rashid Oomer, managing director of Al Baraka Finance stated “[c]urrently, 60 percent of the Saudi imports of these seeds are sources by us from Sudan.”</p> <p>A 1996 United States State Department report entitled, <i>Osama Bin Laden: Islamic Extremist Financier</i>, describes the likely economic collaboration of Saleh Kamel and Al Baraka with Bin Laden:</p> <p>“Bin Laden’s import-export firm Wadi al-Aqiq Company, Ltd., in conjunction with his Taha Investment Company, Lrd., secured a near monopoly over Sudan’s major agricultural exports of gum, corn, sunflower, and sesame products in cooperation with prominent NIF members.”</p>
<i>Cantor Fitzgerald</i>	<i>Continental Casualty</i>
Contains only conclusory allegations.	<p>In 1992, regarding Saleh Kamel's and Al Baraka's investments in Sudan, Rashid Oomer, managing director of Al Baraka Finance stated “[c]urrently, 60 percent of the Saudi imports of these seeds are sources by us from Sudan.”</p> <p>A 1996 United States State Department report entitled, <i>Osama Bin Laden: Islamic Extremist Financier</i>, describes the likely economic collaboration of Saleh Kamel and Al Baraka with Bin Laden:</p> <p>“Bin Laden’s import-export firm Wadi al-Aqiq Company, Ltd., in conjunction with his Taha Investment Company, Lrd., secured a near monopoly over Sudan’s major agricultural exports of gum, corn, sunflower, and sesame products in cooperation with prominent NIF members.”</p>
<i>NY MAGIC</i>	<i>WTC Properties</i>
Contains only conclusory allegations.	<p>In 1992, regarding Saleh Kamel's and Al Baraka's investments in Sudan, Rashid Oomer, managing director of Al Baraka Finance stated “[c]urrently, 60 percent of the Saudi imports of these seeds are sources by us from Sudan.”</p> <p>A 1996 United States State Department report entitled, <i>Osama Bin Laden: Islamic Extremist Financier</i>, describes the likely economic collaboration of Saleh Kamel and Al Baraka with Bin Laden:</p> <p>“Bin Laden’s import-export firm Wadi al-Aqiq Company, Ltd., in conjunction with his Taha Investment Company, Lrd., secured a near monopoly over Sudan’s major agricultural exports of gum, corn, sunflower, and sesame products in cooperation with prominent NIF members.”</p>

Misc. Business Enterprises

<p><i>O'Neill</i></p> <ul style="list-style-type: none"> - In 1999, it was announced that Kamel and DABG were 25 percent minority shareholders in FLAG Telecom, which was licensed to build a “dual transoceanic cable system” between New York City and a number of European capitals. - Al Baraka’s wholly owned sporting goods subsidiary Eurovictory Sports, USA, imports footwear from Europe into the United States. - Saleh Abdullah Kamel is a principal shareholder and former Chairman of the Saudi Arabia-based Tihama Group for Advertising, Public relations & Marketing. - Saleh Kamel is the owner of the Iqraa satellite television network. - Saleh Kamel has exploited his satellite TV channel to propagate his violent jihad against the west and rally financial support for terrorist activities carried out by Al Qaeda and other transnational terror groups... 	<p><i>Euro Brokers</i></p> <ul style="list-style-type: none"> - In 1999, it was announced that Kamel and DABG were 25 percent minority shareholders in FLAG Telecom, which was licensed to build a “dual transoceanic cable system” between New York City and a number of European capitals. - Al Baraka’s wholly owned sporting goods subsidiary Eurovictory Sports, USA, imports footwear from Europe into the United States. - Saleh Abdullah Kamel is a principal shareholder and former Chairman of the Saudi Arabia-based Tihama Group for Advertising, Public relations & Marketing. - Saleh Kamel is the owner of the Iqraa satellite television network. - Saleh Kamel has exploited his satellite TV channel to propagate his violent jihad against the west and rally financial support for terrorist activities carried out by Al Qaeda and other transnational terror groups...
<p><i>Cantor Fitzgerald</i></p> <p>Contains only conclusory allegations.</p>	<p><i>Continental Casualty</i></p> <ul style="list-style-type: none"> - In 1999, it was announced that Kamel and DABG were 25 percent minority shareholders in FLAG Telecom, which was licensed to build a “dual transoceanic cable system” between New York City and a number of European capitals. - Al Baraka’s wholly owned sporting goods subsidiary Eurovictory Sports, USA, imports footwear from Europe into the United States. - Saleh Abdullah Kamel is a principal shareholder and former Chairman of the Saudi Arabia-based Tihama Group for Advertising, Public relations & Marketing. - Saleh Kamel is the owner of the Iqraa satellite television network. - Saleh Kamel has exploited his satellite TV channel to propagate his violent jihad against the west and rally financial support for terrorist activities carried out by Al Qaeda and other transnational terror groups...
<p><i>NY MAGIC</i></p> <p>Contains only conclusory allegations.</p>	<p><i>WTC Properties</i></p> <ul style="list-style-type: none"> - In 1999, it was announced that Kamel and DABG were 25 percent minority shareholders in FLAG Telecom, which was licensed to build a “dual transoceanic cable system” between New York City and a number of European capitals. - Al Baraka’s wholly owned sporting goods subsidiary Eurovictory Sports, USA, imports footwear from Europe into the United States. - Saleh Abdullah Kamel is a principal shareholder and former Chairman of the Saudi Arabia-based Tihama Group for Advertising, Public relations & Marketing. - Saleh Kamel is the owner of the Iqraa satellite television network. - Saleh Kamel has exploited his satellite TV channel to propagate his violent jihad against the west and rally financial support for terrorist activities carried out by Al Qaeda and other transnational terror groups...

Misc. Charitable Activities

<p><i>O'Neill</i></p> <ul style="list-style-type: none"> - Iqraa International is a Saudi-based charitable organization founded in 1983 by Saleh Abdullah Kamel. - Iqraa also developed its activities in India through the Iqraa International Hospital and Research Center, jointly financed at a cost of \$5 million by DABG and Iqraa International. The Iqraa Charitable Society financial operations are frequently jointly operated along with DABG. - Kamel and DABG sponsored the Third Harvard University Forum on Islamic Finance... - In 1992, Saleh Kamel contributed substantial funds and 10 ambulances to the Saudi Higher Committee for Collecting Donations for Muslims of Bosnia-Herzegovina. - Saleh Kamel visited Bulgaria "prior to 1999 and met with members of various Islamic foundations financed by fundamentalist circles." -In 2004.., Kamel hosted... John Snow, U.S. Treasury Secretary, at a Washington Islamic Banks Conference. 	<p><i>Euro Brokers</i></p> <ul style="list-style-type: none"> - Iqraa International is a Saudi-based charitable organization founded in 1983 by Saleh Abdullah Kamel. - Iqraa also developed its activities in India through the Iqraa International Hospital and Research Center, jointly financed at a cost of \$5 million by DABG and Iqraa International. The Iqraa Charitable Society financial operations are frequently jointly operated along with DABG. - Kamel and DABG sponsored the Third Harvard University Forum on Islamic Finance... - In 1992, Saleh Kamel contributed substantial funds and 10 ambulances to the Saudi Higher Committee for Collecting Donations for Muslims of Bosnia-Herzegovina. - Saleh Kamel visited Bulgaria "prior to 1999 and met with members of various Islamic foundations financed by fundamentalist circles." -In 2004.., Kamel hosted... John Snow, U.S. Treasury Secretary, at a Washington Islamic Banks Conference.
<p><i>Cantor Fitzgerald</i></p> <p>Contains only conclusory allegations.</p>	<p><i>Continental Casualty</i></p> <ul style="list-style-type: none"> - Iqraa International is a Saudi-based charitable organization founded in 1983 by Saleh Abdullah Kamel. - Iqraa also developed its activities in India through the Iqraa International Hospital and Research Center, jointly financed at a cost of \$5 million by DABG and Iqraa International. The Iqraa Charitable Society financial operations are frequently jointly operated along with DABG. - Kamel and DABG sponsored the Third Harvard University Forum on Islamic Finance... - In 1992, Saleh Kamel contributed substantial funds and 10 ambulances to the Saudi Higher Committee for Collecting Donations for Muslims of Bosnia-Herzegovina. - Saleh Kamel visited Bulgaria "prior to 1999 and met with members of various Islamic foundations financed by fundamentalist circles." -In 2004.., Kamel hosted... John Snow, U.S. Treasury Secretary, at a Washington Islamic Banks Conference.
<p><i>NY MAGIC</i></p> <p>Contains only conclusory allegations.</p>	<p><i>WTC Properties</i></p> <ul style="list-style-type: none"> - Iqraa International is a Saudi-based charitable organization founded in 1983 by Saleh Abdullah Kamel. - Iqraa also developed its activities in India through the Iqraa International Hospital and Research Center, jointly financed at a cost of \$5 million by DABG and Iqraa International. The Iqraa Charitable Society financial operations are frequently jointly operated along with DABG. - Kamel and DABG sponsored the Third Harvard University Forum on Islamic Finance... - In 1992, Saleh Kamel contributed substantial funds and 10 ambulances to the Saudi Higher Committee for Collecting Donations for Muslims of Bosnia-Herzegovina. - Saleh Kamel visited Bulgaria "prior to 1999 and met with members of various Islamic foundations financed by fundamentalist circles." -In 2004.., Kamel hosted... John Snow, U.S. Treasury Secretary, at a Washington Islamic Banks Conference.